

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

In re: PREPAID WIRELESS GROUP, LLC. Debtors.	Case No. 24-18852-MCR (Chapter 11)
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**UNITED STATES TRUSTEE’S OBJECTION
TO APPLICATION TO EMPLOY DUNDON ADVISORS, LLC
AS FINANCIAL ADVISORS TO THE DEBTOR**

Gerard R. Vetter, Acting United States Trustee for Region 4 (“United States Trustee”), by counsel, objects to the Debtor’s application to employ Dundon Advisors, LLC (“Dundon”) as Financial Advisors to the Debtor under Sections 327(a), 328(a), and 330 of the Bankruptcy Code. The United States Trustee does not dispute Dundon’s qualifications as a Financial Advisor. The United States Trustee objects because it is unclear what rights the Court, the United States Trustee, and parties in interest have to review Dundon’s fees. Although the Application states that Dundon is being employed under Section 330, the proposed order states that “compensation shall be subject to the standard review provision under section 328(a) of the Bankruptcy Code, and not subject to any other standard of review under section 330 of the Bankruptcy Code.” Section 328(a) states the terms of the engagement are subject to reversal only if found to be “improvident in light of development not capable of being anticipated at the time of the fixing of such terms and conditions.” Section 330 states that only the professional may be compensated only for “reasonable compensation for actual, necessary services.”

The United States Trustee wants to make sure that Dundon will file fee applications, and that the United States Trustee has the right to review those fees under the standards set forth in Section 330 of the Bankruptcy Code. Moreover, the United States Trustee wants to make sure

that Dundon is required to comply with the Compensation Guidelines for Professionals in the United States Bankruptcy Court for the District of Maryland, which is attached as Appendix D to the Local Rules.

WHEREFORE, the United States Trustee respectfully requests that the Application be denied without prejudice and for such other and further relief as is warranted.

Dated: November 18, 2024

Respectfully submitted,

GERARD R. VETTER

Acting United States Trustee for Region 4
By Counsel:

/s/ Lynn A. Kohen

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 18, 2024, I caused to be served a true and correct copy of the foregoing United States Trustee's Objection to Application to Employ Dundon Advisors, LLL as Financial Advisors to the Debtor by ECF notification upon the following:

- **David W.T. Daniels** ddaniels@perkinscoie.com
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/s/ Lynn A. Kohen

Lynn A. Kohen